

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**TYRONE HENDERSON,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO: 3:12cv97-REP**

**CORELOGIC, INC., *et al.*,**

**Defendants.**

**MOTION FOR AN EXTENSION OF THE DISCOVERY PERIOD**

COMES NOW the Plaintiff, by counsel, and pursuant to Fed. R. Civ. P. 6(b) moves the Court to for an extension of the discovery period by 60 days. Pursuant to the Court's Order of June 20, 2013, the discovery cut-off is currently set for Friday, August 30, 2013, which time has not yet expired. The parties have been engaged in a meaningful and substantial meet and confer process concerning the discovery in this matter, and as of the date of this filing, the meet and confer process had not been completed. The parties agreed that the Plaintiff should file a motion to extend the discovery cutoff, but that the Defendant could not provide its consent by the time the motion should be filed.

The court entered an agreed Phase I Discovery Order on June 20, 2013. Among the acts required of the parties pursuant to the Order, the Defendant was to (1) provide the Plaintiff with a list of its customers within the Fourth Circuit; and (2) provide the Plaintiff with a mirror image of its results returned database. The Defendant complied with the court's order, producing its customer list in late July. However, it was only able to produce the database on August 5, 2013, with less than four weeks prior to the discovery cut-off.

The parties continue to meet and confer. Within seven days of this motion, the parties

will submit a proposed agreed scheduling order or, if an agreement by compromise cannot be reached at that time, the Plaintiff will file formal briefing requesting the court enter a revised scheduling order.

This motion is made in good faith and for good cause shown. It is not made for a dilatory or improper purpose. By granting this motion, the interests of justice will be served. Accordingly, the Plaintiff respectfully requests that the Court grant the motion to extend the discovery cut-off by 60 days.

Respectfully submitted,

**TYRONE HENDERSON,**

/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of August 2013, I will file the foregoing motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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